

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NOKIA CORPORATION,

Plaintiff,

-against-

INTERDIGITAL, INC., INTERDIGITAL  
COMMUNICATIONS, LLC, and  
INTERDIGITAL TECHNOLOGY  
CORPORATION,

Defendants.

No. 08-cv-01507

**DECLARATION OF**  
**MATTHEW D. RICHARDSON**

I, MATTHEW D. RICHARDSON, declare under the penalty of perjury:

1. I am an attorney with Alston & Bird LLP, 1201 West Peachtree Street, Atlanta, Georgia 30309-3424. I have personal knowledge of the facts stated herein. I make this Declaration in support of Nokia Corporation's Reply in Support of its Motion for Preliminary Injunction and Application for a Show Cause Order.

2. Attached hereto as Exhibit A is a true and correct copy of a January 30, 2008 email from Chris Isaac to Matthew Richardson.

3. Attached hereto as Exhibit B is a true and correct copy of InterDigital's Answer to Nokia's First Amended Complaint in the Delaware action.

4. Attached hereto as Exhibit C is a true and correct copy of the ALJ's Order No. 21, Denying in Part Nokia's Motion No. 613-30.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.

This 17th day of March, 2008.

A handwritten signature in black ink, appearing to read "Matt Richardson", written over a horizontal line.

Matthew D. Richardson

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**From:** Isaac, Chris [chris.isaac@finnegan.com]  
**Sent:** Wednesday, January 30, 2008 8:01 AM  
**To:** Richardson, Matt  
**Cc:** Shay, Lawrence F; Isztwan, Andrew G  
**Subject:** Response to your request for a pre-arbitration meeting  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Mr. Richardson,

InterDigital does not agree there is an arbitrable issue between the parties. Contrary to your assertion, the mere fact that InterDigital and Nokia disagree on something does not create an arbitrable issue. In any event, we now have a judicial ruling that Nokia has waived any alleged right to arbitrate the TDD license issue. Since Nokia has waived its right to request an arbitration, there is no reason to have a meeting as a prerequisite to requesting an arbitration. InterDigital will oppose any attempt by Nokia to ignore the decision of Judge Luckern and attempt to institute an arbitration.

Chris Isaac

This e-mail message is intended only for individual(s) to whom it is addressed and may contain information that is privileged, confidential, proprietary, or otherwise exempt from disclosure under applicable law. If you believe you have received this message in error, please advise the sender by return e-mail and delete it from your mailbox. Thank you.

3/12/2008

**Exhibit B**

**Document To Be  
Filed Under Seal**

**Exhibit C**

**Document To Be  
Filed Under Seal**